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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

LAURA HANSON,

Plaintiff,

v.

**STATE OF OREGON LEGISLATIVE
ASSEMBLY,**

Defendant.

Case No. 3:21-CV-00780-SI

**PLAINTIFF'S RESPONSES TO
DEFENDANT'S OBJECTIONS TO
PLAINTIFF'S STATEMENT OF
SPECIAL DAMAGES AND MOTION
TO STRIKE**

Plaintiff responds to Defendant's objections to Plaintiff's special damages and motion to strike as follows:

CONFERRAL

Defendant failed to confer regarding its motion to strike under LR7-1.

RESPONSE

The basis for Defendant's objection is unclear. Defendant's own records show Plaintiff's employment at the Oregon Employment Department ended on August 31, 2021. Pl. Trial Ex. 43 at 2 (Hanson_Defendants_000745). Plaintiff provided to Defendant extensive records of job applications after that point. Clearly, Defendant was aware Plaintiff was looking for a job as of December 2022 because it offered to rehire her.

However, Defendant's Exhibit 229 did clarify that Plaintiff was paid \$5,219 at the time of her termination, rather than the \$4,727 listed in her initial hire paperwork and in error on Plaintiff's list of special damages. This makes our estimate of Plaintiff's total wage loss \$125,282. We apologize for this error.

Plaintiff's therapist's records were provided as Plaintiff's Trial Exhibit 41. While one page of the document does not include the costs of the visits, Plaintiff or her therapist are available to testify that the cost per visit did not change. Defendant has requested updated records, and we have reached out to medical providers to find out if there are any updates.

Plaintiff asks the court to deny Defendant's motion.

Submitted this 25th Day of April, 2024.

/s/ Rebecca Cambreleng
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CERTIFICATE OF SERVICE

I certify that on April 25, 2024, I served the foregoing **PLAINTIFF'S RESPONSES TO DEFENDANT'S OBJECTIONS TO PLAINTIFF'S STATEMENT OF SPECIAL DAMAGES AND MOTION TO STRIKE** upon the parties hereto via electronic means through the Court's Case Management/Electronic Case File system and via electronic mail:

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